

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,
Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,
Defendants.

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Case No. 5:21-cv-844-XR

OCA-GREATER HOUSTON, *et al.*,
Plaintiffs,

v.

JOSE A. ESPARZA, *et al.*,
Defendants.

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Case No. 1:21-cv-780-XR

HOUSTON JUSTICE, *et al.*,
Plaintiffs,

v.

GREGORY WAYNE ABBOTT, *et al.*,
Defendants.

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Case No. 5:21-cv-848-XR

LULAC TEXAS, *et al.*,
Plaintiffs,

v.

JOSE ESPARZA, *et al.*,
Defendants.

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Case No. 1:21-cv-0786-XR

MI FAMILIA VOTA, *et al.*,
Plaintiffs,

v.

GREG ABBOTT, *et al.*,
Defendants.

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Case No. 5:21-cv-0920-XR

UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND

Pursuant to the Scheduling Order (ECF No. 125 at 1), and in response to the State Defendants' motions to dismiss the complaints of the *LUPE*, *LULAC*, *OCA-Greater Houston*, *Houston Justice*, and *Mi Familia Vota* plaintiffs (ECF Nos. 53, 54, 55, 64, 67), on December 1, 2021, the plaintiffs in these consolidated cases filed amended complaints (ECF Nos. 136, 137, 139, 140).¹ On December 2, 2021, the Court entered text orders denying the State Defendants' motions to dismiss as moot. Pursuant to Federal Rule of Civil Procedure 15(a)(3), the State Defendants' responses to these amended pleadings are due December 15, 2021.

The State Defendants respectfully request that the Court extend their deadline to answer or otherwise respond to these amended complaints to January 5, 2022. The State Defendants request this extension to allow them sufficient time to analyze the impact of the changes made in these amended complaints and whether they address the issues raised in the State Defendants' motions to dismiss in these consolidated cases. Moreover, the State Defendants must also analyze factual allegations and claims that are new and substantially different from those pleaded in the plaintiffs' original complaints. In addition to analyzing these amended complaints, the State Defendants have been preparing their response to the United States' Amended Complaint, which is due December 14, 2021.

Counsel for the State Defendants also have significant schedule commitments that necessitate this extension request. For example, counsel for the State Defendants have been preparing for a hearing on two Expedited Motions for Temporary Injunction scheduled for December 15 and 16, 2021, in consolidated state court redistricting cases. *Mexican Am. Legis. Caucus v. Abbott*, No. D-1-GN-21-006515 (250 Dist. Ct., Travis Cnty., Tex.) (lead case).

¹ Originally, the *Houston Justice* and *Mi Familia Vota* plaintiffs filed separate complaints, but they jointly filed an amended complaint on December 1, 2021. See ECF No. 139.

The State Defendants have consulted with counsel for each of the plaintiff groups in these consolidated cases, and none oppose the requested extension. The State Defendants do not seek this extension for delay, but for good cause. The requested extension will not prejudice the plaintiffs, who do not oppose the relief requested.

Date: December 14, 2021

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**Application for Admission Pending*

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COUNSEL FOR STATE DEFENDANTS

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for the *LUPE*, *LULAC*, *OCA-Greater Houston*, *Houston Justice*, and *Mi Familia Vota* plaintiffs about the foregoing motion, and they have stated that their clients do not oppose the relief requested.

/s/ Jeffrey M. White
Jeffrey M. White

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on December 14, 2021, and that all counsel of record were served by CM/ECF.

/s/ Jeffrey M. White
Jeffrey M. White